



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10 HANFORD PROJECT OFFICE

712 SWIFT BOULEVARD, SUITE 5

RICHLAND, WASHINGTON 99352

October 6, 1994

Paul Pak
U.S. Department of Energy
P.O. Box 550
Richland, Washington 99352



Re: 200-BP-5 Operable Unit Treatability Test

Dear Mr. Pak:

As you know, the Environmental Protection Agency is very concerned about the delays in operation of the 200-BP-5 Operable Unit Treatability Tests. According to Milestone M-13-06A, change control form M-13-93-03, "The treatment, if determined effective, will continue to operate until the Record of Decision (ROD)." Since EPA has not granted authorization to shut down either of the pump and treatment systems, Milestone M-13-06A is currently being violated.

The EPA has not received a formal transmittal from the Department of Energy (DOE) with detailed justification for ceasing operations, although informal communications have occurred. Based on the informal communications mentioned above, EPA believes appropriate justification for ceasing operations does not exist.

The EPA strongly recommends and urges that an injection test be performed on well 299-E28-7 as soon as possible. Current data suggest this well should be sufficient for injection at the low pumping rates expected. If the testing data support its use, well 299-E28-7 should be used as the reinjection well at the 216-B-5 Reverse Well plume. This can be accomplished with minimal time, expenditure of funds, and added work. If the testing data does not support the use of well 216-E28-7, well 299-E28-24 should be used at this time.

At this time, EPA recommends not performing any additional bench or lab scale treatability tests to determine a suitable resin (or other product), nor adding columns to the existing system at the 216-B-5 Reverse Well to remove Strontium-90 to levels below EPA's drinking water standard of 8 pCi/l. The necessity for additional columns will be assessed when and if the system begins 24 hour operations.


In addition to restarting the pump and treat systems, EPA expects to see a detailed schedule for the 200-BP-5 Operable Unit before the Monday, October 17, 1994, 1:00 PM meeting. The

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schedule should include, but is not limited to: completion date of winterization and 24 hour a day operation; submittal of a treatability test report; submittal of a proposed plan; submittal of remedial action and remedial design plans; submittal of bid and award packages for remediation; and contractor mobilization.

The EPA expects the pump and treat system located at the 216-B-5 Reverse Well to continue operation by October 17, 1994. Also, the pump and treat system at the BY Cribs Plume should be re-started immediately. If you have any questions or concerns regarding this letter, please contact me at (509) 376-8665.

Sincerely


Paul R. Beaver
Unit Manager

cc: Dave Erb, BHI
Dibaker Goswami, WDOE
Rich Holten, DOE
Kenneth Porter, BHI
Joseph Zoghbi, BHI
Administrative Record, 200-BP-5 Operable Unit